

EXHIBIT S

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS

3 NEW ENGLAND COMPOUNDING) MDI NO. 2419
4 PHARMACY, INC., PRODUCTS) Master Dkt.
5 LIABILITY LITIGATION,) 1:13-md-02419-RWZ
6 THIS PERTAINS TO:)
7 ALL ACTIONS)

8
9 DEPOSITION OF KIMBERLY BOWLIN
10 TAKEN BY BENJAMIN A. GASTEL, ESQ.
11 ON BEHALF OF THE PLAINTIFFS
12 NOVEMBER 06, 2015

13 REPORTED BY SUSAN M. FIALA
14 REGISTERED PROFESSIONAL REPORTER
15 CERTIFIED SHORTHAND REPORTER
16 CERTIFIED COURT REPORTER
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1 day, correct?

2 MR. MORAN: Objection.

3 A. That was not included on the daily
4 update.

5 Q. (By Mr. Gastel) Okay. But it would
6 include how many office visits each doctor was
7 going to have that day, correct?

8 MR. MORAN: Objection.

9 A. I don't really remember exactly what
10 all was on the updates.

11 Q. (By Mr. Gastel) Would they show the
12 amount of money that was deposited each day?

13 A. Yes.

14 Q. And Specialty Surgery Center was a
15 for-profit corporation, correct?

16 A. Yes.

17 Q. And Specialty Surgery Center expected
18 to be paid by the patients that were treated at
19 Specialty Surgery Center, correct?

20 A. Yes.

21 Q. So if a -- if a patient received an
22 endoscopy at Specialty Surgery Center, Specialty
23 Surgery Center would expect to be paid, correct?

24 A. Yes. Either from the patient or their
25 insurance carrier.

1 Q. And one procedure that a patient could
2 receive at -- at Specialty Surgery Center was an
3 epidural steroid injection, right?

4 A. Yes.

5 Q. And that was part of the pain
6 management topic that we discussed earlier,
7 right?

8 A. Yes.

9 Q. And when Specialty Surgery Center
10 provide -- or performed an epidural steroid
11 injection it expected a patient to pay for that,
12 correct?

13 A. Yes.

14 Q. And Specialty Surgery Center provided
15 epidural steroids to patients in exchange for
16 money, correct?

17 A. Yes.

18 Q. Did you ever witness an epidural
19 steroid injection being done at Specialty
20 Surgery Center?

21 A. No.

22 Q. Was Dr. Lister the only doctor at
23 Specialty Surgery Center who performed epidural
24 steroid injections?

25 A. Yes.